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1 Q. Why not?

2 A. Because there's certain headings that  
3 you have to make sure you have for your  
4 hours. You just can't take any hours.  
5 It have to be specific guidelines that  
6 you have to take.

7 Q. Did you call around to other places to  
8 see if they were being offered?

9 A. No, sir.

10 Q. You didn't call around?

11 A. No, sir.

12 Q. Why not?

13 A. Because I had paid for this class.

14 Q. Which was after the deadline?

15 A. No, it was before the deadline. I had  
16 paid before.

17 Q. The class was in March; right?

18 A. Oh, the class was in March, yes.

19 Q. How much was the -- how much had you  
20 paid for it?

21 A. Ten dollars.

22 Q. How much?

23 A. Ten dollars.

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1 Q. And you think that there are -- there  
2 were other teachers who were allowed to  
3 take classes after the deadline?

4 A. Yes, sir. Those teachers on there,  
5 yes, sir.

6 Q. And who was allowed to take classes  
7 after the deadline?

8 A. Mr. Lamar, Miss Heather.

9 Q. Who else?

10 A. Miss Mary.

11 Q. Miss Mary?

12 A. Yes.

13 Q. All right. Who else?

14 A. Those are all.

15 Q. So those three people were allowed to  
16 take -- in your belief, were allowed to  
17 take certificate training hours after  
18 the cutoff in February?

19 A. Yes, sir.

20 Q. And how do you know that?

21 A. Because they were still taking their  
22 classes.

23 Q. Who was?

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1 A. Mr. Lamar, Miss Mary, Miss Heather.

2 Q. Where were they taking their classes?

3 A. Through Family Guidance, through --  
4 Family Guidance.

5 Q. And how do you know they were taking  
6 classes through Family Guidance?

7 A. That's where the twelve-hour  
8 certificate guidelines will start,  
9 right there, Family Guidance, and you  
10 have to go through them.

11 Q. How do you know they were doing it?  
12 How do you know they were going to be  
13 taking these classes?

14 A. Mr. Lamar would leave early and take  
15 his.

16 Q. I mean, how do you know?

17 A. He would tell me he was going out to  
18 take his class.

19 Q. Okay. How about Miss Heather, how did  
20 you know she was taking her classes?

21 A. She would tell me.

22 Q. And how about Miss Mary?

23 A. She would tell me.

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1 Q. Do you know what year their credits  
2 were applying towards?

3 A. What you mean what year?

4 Q. They're taking classes, but that could  
5 have been for the next year; right?

6 A. No, sir. It was during that year.

7 Q. It's in March, but since it's past the  
8 deadline, they could have applied those  
9 credits forward, right, to the next  
10 year?

11 (No immediate response given.)

12 Q. Correct?

13 A. No, sir. It was for that year.

14 Q. How do you know that?

15 A. Because you have to have your twelve  
16 hours every year.

17 Q. How do you know they didn't have them?

18 A. Because they start and they will  
19 tell -- you know, she said she was  
20 going out. Miss Heather said she had  
21 to complete her twelve hours. So she  
22 didn't have her twelve hours. She was  
23 still working on the twelve hours.

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1 Q. So you're saying Miss Heather told you  
2 that she was deficient?

3 A. Yeah, she was still working on her  
4 twelve hours.

5 Q. And that after the cutoff she went to  
6 classes to get her --

7 A. Twelve hours.

8 Q. -- twelve hours for these --

9 A. Finish her twelve hours also.

10 Q. For the '05 year -- '04 year?

11 A. And Mr. Lamar had to get his, because  
12 he had just started working. So he had  
13 to get his twelve hours all at one time  
14 to catch up.

15 Q. Okay. And you were not allowed to do  
16 the -- you were not allowed to do that?

17 A. No, sir.

18 Q. Do you know why? Any idea?

19 A. There again, my race and gender.

20 Q. Your race and your gender?

21 A. Yes, sir.

22 Q. Well, it appears that -- I mean, from  
23 what you're telling me -- Mr. Lamar is

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1 a male; right?

2 A. Yes, sir.

3 Q. Miss Heather is a female?

4 A. Right.

5 Q. And Miss Mary is a female?

6 A. Right.

7 Q. So you've got males and females who are  
8 being given this alleged privilege;  
9 right?

10 A. Yes. Caucasian females.

11 Q. Well, I'm just talking about gender  
12 now.

13 A. And gender.

14 Q. You've got males and females who are  
15 given this privilege?

16 A. Uh-huh.

17 Q. You're saying you weren't given that  
18 privilege because you're a female.  
19 That's the gender claim; right?

20 A. That's the gender claim.

21 Q. But males and females were given the  
22 privilege?

23 A. But that's the race claim.

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1 Q. So that's --

2 MR. HURST: But you're a  
3 female. Just stop for just a female.  
4 If you're a female, you can't bring a  
5 gender claim because other females was  
6 given --

7 THE WITNESS: But I -- okay.

8 MR. HURST: So only bringing a  
9 race claim on that.

10 Q. So that's a race claim. Now,  
11 Mr. Lamar, is he a black man?

12 A. Yes, sir.

13 Q. Miss Heather is a white female?

14 A. Yes, sir.

15 Q. Miss Mary is a white female?

16 A. Yes, sir.

17 Q. So it appears that blacks and whites  
18 are given this same alleged privilege;  
19 right?

20 A. Yes, sir.

21 Q. That's a yes?

22 A. Yes, sir.

23 Q. Okay. Tell me about this claim:

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1 church a lot of money and they were not  
2 going to let her go no matter how many  
3 times plaintiff speaks or writes the  
4 administrator. Dropping that one?

5 MR. HURST: That's not a claim.  
6 I think that's a statement.

7 MR. GARRETT: Well, I don't  
8 know what this -- I'm just trying to  
9 clean it up.

10 Q. Is that --

11 A. No, sir.

12 Q. That's dropped as well. Plaintiff's  
13 supervisor showed bias on the staff/  
14 child ratio. Plaintiff believes other  
15 teachers received additional staffing  
16 in their classroom. How about that  
17 one?

18 A. Yes, sir, keeping that.

19 Q. You're keeping that one. All right.  
20 Tell me about what you mean there.  
21 Tell me about this one. What are you  
22 talking about? Plaintiff's supervisor  
23 showed bias on a staff/child ratio.



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1 Let's start there.

2 A. That's when there's more than one  
3 teacher in the classroom, when the  
4 ratio is --

5 Q. First of all, when are we talking  
6 about? What date are we talking about?

7 MR. HURST: It has to be based  
8 on race and gender.

9 THE WITNESS: Yeah.

10 A. What classroom?

11 Q. What date? What instance?

12 A. This was in '05.

13 Q. In '05. Okay. And what happened in  
14 2005?

15 A. There was classes, Miss Mary and  
16 Miss Heather, who had over three  
17 teachers, and their staff ratio was two  
18 to the children -- that they had was  
19 two to their staff ratio, two teachers.

20 Q. So Miss Mary and Miss Heather -- and  
21 they're white females; right?

22 A. Right.

23 Q. They had three teachers in the room?

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1 A. Yes, sir.

2 Q. Which teachers were in Miss Mary's  
3 room?

4 A. Mr. Lamar and Miss Latora, Miss Pat.

5 Q. Mr. Lamar, Miss Latora, and Pat?

6 A. Miss Keitha.

7 Q. Wait a minute. That's four.

8 A. I'm doing both classes. Are you just  
9 talking Miss Mary?

10 Q. I'm starting Miss Mary. I just want to  
11 know who was in Miss Mary's class.

12 A. Miss Pat and Latora.

13 Q. And Lamar was not?

14 A. He was floating in her class.

15 Q. So he wasn't a teacher, though, he was  
16 just popping in if they needed help;  
17 right?

18 A. Right.

19 Q. How about Heather?

20 A. She had Miss Keitha and Miss -- I want  
21 to pronounce her name right -- Tora,  
22 Miss Tora.

23 Q. Miss Tora?

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1 A. I think that's how she pronounce it.

2 Q. Okay. Miss Tora, white or black?

3 A. She's black.

4 Q. Miss Keitha?

5 A. She's black.

6 Q. Miss Heather's white?

7 A. Yes.

8 Q. Miss Mary's white?

9 A. Yes.

10 Q. How about Latora?

11 A. Black.

12 Q. How about Pat, Miss Pat?

13 A. Black.

14 Q. And what age group are they teaching?

15 A. Miss Mary had the crawlers.

16 Q. Crawlers?

17 A. Crawlers.

18 Q. What is that?

19 A. Nine months to eighteen months.

20 Q. How about Heather?

21 A. She had the young twos.

22 Q. Young twos. All right. And at that  
23 time in 2005 you were pre-K; right?

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1 A. Right.

2 Q. And you believe that you should have  
3 had another teacher in your classroom?

4 A. Yes, sir.

5 Q. What do you base that on?

6 A. Sir?

7 Q. What do you base that on? Why did you  
8 need another teacher in your classroom?

9 A. To assist and help.

10 Q. To assist you?

11 A. Yes.

12 Q. Were there -- do you have any idea why  
13 there were more teachers in Miss Mary  
14 and Miss Heather's class?

15 A. Why?

16 Q. Yeah. Do you know why, what  
17 necessitated more teachers in those  
18 classes?

19 A. No, sir.

20 Q. So you don't have any idea why  
21 there's -- why there would be three  
22 teachers in those classes and only one  
23 in yours?

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1 A. That's the way she made the schedule  
2 out.

3 Q. Do you know if there was any guidelines  
4 that dictated why there would be more  
5 teachers in certain classes than  
6 others?

7 A. No, sir.

8 Q. Okay. Do you feel like the classes  
9 were loaded -- do you feel like  
10 Mary's -- Miss Mary and Miss Heather's  
11 classes had more teachers in  
12 retaliation to you?

13 A. What do you mean?

14 Q. I mean, do you feel like there's  
15 only -- that you were the only teacher  
16 in the pre-K class because you're  
17 female?

18 A. No, sir.

19 Q. Do you feel like there was only -- that  
20 you were the only teacher in your pre-K  
21 class because you are a black lady?

22 A. Yes.

23 Q. It's because you're black?

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1 A. Yes, sir.

2 Q. Has anybody ever told you that, ever  
3 indicated to you that you were the only  
4 teacher in that classroom because of  
5 your color?

6 A. No, sir.

7 Q. Did you ever ask anybody why you were  
8 the only teacher in that classroom?

9 A. Did I ever ask?

10 Q. Yeah. Did you ever ask anybody why you  
11 were the only teacher in the pre-K  
12 room?

13 A. Yes, sir.

14 Q. Who did you ask?

15 A. Ms. Darlene Maye.

16 Q. What did she tell you?

17 A. She didn't tell me anything.

18 Q. So you asked her and she just sat  
19 there?

20 A. Yes, sir.

21 Q. She didn't give you any verbal  
22 response?

23 A. No, she did not.

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1 Q. Did she just stare at you until you  
2 left?

3 A. It was during staff meeting I asked  
4 her.

5 Q. You asked her in a staff meeting?

6 A. Yes.

7 Q. When was that staff meeting?

8 A. I can't remember.

9 Q. Sorry?

10 A. I can't remember.

11 Q. Who was present at the staff meeting?

12 A. I don't remember all those present.

13 Q. Would have been all the --

14 A. The employees.

15 Q. -- teachers? All the teachers were  
16 there?

17 A. Yes.

18 Q. Ms. Maye was there?

19 A. Yes.

20 Q. How about co-teachers, were they there?

21 A. I don't recall all of them being there.  
22 I don't know who all was.

23 Q. And during this meeting, what did you

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1 say exactly?

2 A. I asked her for -- that I needed help  
3 in the classroom.

4 Q. You asked her -- you told her --

5 A. I asked her.

6 Q. -- you needed help in the classroom?

7 A. Yes.

8 Q. And what did she say?

9 A. She told me she didn't have the staff  
10 to come help me and that I was at ratio  
11 and staff -- ratio and teacher.

12 Q. Do you think that's true?

13 A. Yes, sir.

14 Q. You do think that's true?

15 A. (Witness nods head.)

16 Q. Well, if that's true, how is she  
17 discriminating against you?

18 A. Because they was at ratio and teacher  
19 also. It was two -- it was only  
20 supposed to been two teachers to their  
21 ratio for the children that are in  
22 their class.

23 Q. So you're saying that -- it's your



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1 belief that due to the capacity -- due  
2 to Miss Mary and Miss Heather's class,  
3 their ratio capacity only dictated that  
4 they needed two people in the room?

5 A. Yes.

6 Q. And then -- and you believe that you  
7 needed help; correct?

8 A. Yes, sir.

9 Q. And that because you're black, Ms. Maye  
10 refused to give you that extra -- give  
11 you any help?

12 A. Yes, sir.

13 Q. Okay. What is the ratio in pre-K for  
14 teachers to students?

15 A. One to eighteen.

16 Q. How many students did you have?

17 A. Fifteen.

18 Q. So you were fine under ratio; right?

19 A. Yes, sir.

20 Q. Next claim here, The plaintiff's  
21 supervisor shows statistics favoritism  
22 with several of the employees.

23 Plaintiff believes there was

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1 employee -- there was employees for  
2 the -- I'm sorry.

3 (Off the record.)

4 Q. Apparently there's a claim in here that  
5 Ms. Maye showed what you're calling a  
6 statistics favoritism with employees  
7 with regard to scheduling. What's that  
8 claim about?

9 A. What? What do you need me to tell you  
10 about it?

11 Q. I need to know what your claim is.

12 A. Well, the schedule, when she schedules  
13 the time for Mr. Lamar, she worked  
14 around his schedule to work and go to  
15 school. But when --

16 Q. Okay.

17 A. -- my schedule needed to change for me  
18 to take care of my children or my  
19 family needs, then it wasn't worked  
20 around.

21 Q. When are you talking about?

22 A. This was in '05.

23 Q. In 2005?

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1 A. Yes.

2 Q. Is this the same three instances we  
3 talked about earlier, the two in  
4 February of '04 and then the unknown  
5 June complaint? Is this the same thing  
6 you're talking about, your son's  
7 accident and then the other one in  
8 February of '04 and then --

9 A. Yes, sir.

10 Q. Same -- that's what you're talking  
11 about, same thing?

12 A. Yes.

13 Q. All right. Plaintiff was passed over  
14 for promotion of assistant director.  
15 The plaintiff believes supervisor  
16 interviewed two employees who did not  
17 apply for the position and hired a  
18 person with less qualifications she  
19 requested plaintiff to have. Tell me  
20 about that.

21 THE WITNESS: I have to drop  
22 that.

23 MR. HURST: Oh, no. We have to

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1 Q. It was?

2 A. I would know it wasn't put in there.

3 Q. It was not put in there?

4 A. It was not put in there.

5 Q. Let's see. Your next complaint -- your  
6 next count in your Amended Complaint,  
7 Sometime around February 2005,  
8 plaintiff was refused time off while  
9 others were frequently given time off.  
10 Have we already --

11 A. Yes, we already . . .

12 Q. We already discussed that?

13 A. Yes.

14 Q. The times we discussed weren't in '05,  
15 though. They were back -- that was  
16 back in 2004 and then an unknown June  
17 year, a June in an unknown year. Is  
18 that --

19 A. Yes.

20 Q. That's what we were talking about?

21 A. Yes.

22 Q. So there's no claim regarding refused  
23 time off in February '05; right?

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1 A. Right.

2 Q. Okay. This says, Ms. Perryman was  
3 aware of several males who were  
4 frequently given time off and special  
5 favors. Males were also given lighter  
6 workloads and were not required to  
7 perform the same tasks as Ms. Perryman.  
8 What males are you referring to?

9 A. Mr. Lamar.

10 Q. So just the one male?

11 A. Yes.

12 Q. There's not more than one male?

13 A. No, sir.

14 Q. And we've talked about your belief  
15 about him getting time off. What about  
16 this -- what special favors are you  
17 referring to?

18 A. The time off.

19 Q. Okay. So that's -- you're just talking  
20 about he got some time off and you  
21 didn't?

22 A. (Witness nods head.)

23 Q. Besides that there's no special favors?

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1 A. Oh, the special favors. He walked and  
2 did as he wanted to do.

3 Q. Do what?

4 A. He would do what he wanted to do  
5 through the center.

6 Q. He would do -- what are you talking  
7 about?

8 A. When he got through with his job, he  
9 would go in and just sit in her office  
10 and have a conversation and that was  
11 it. After he finished doing what she  
12 told him to do, he would go in and sit  
13 and talk.

14 Q. What's wrong with that?

15 A. That's when he's supposed to come in  
16 and helped me at twelve with the  
17 children. But he never did come in  
18 there.

19 Q. When are you talking about? I mean,  
20 what are you -- you're saying that you  
21 feel like Mr. Lamar should have floated  
22 to your room?

23 A. That's the time he's supposed to have

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1 floated to my room.

2 Q. To your room?

3 A. Yes. That's what she told me, Ms. D.

4 Q. So Ms. D told you that Mr. -- it's your  
5 testimony that Ms. D told you that  
6 Mr. Lamar had an assigned time period  
7 to be in your room?

8 A. Yes, sir.

9 Q. And that Mr. Lamar never did?

10 A. No, sir.

11 Q. And you feel like he was allowed not to  
12 do that because of your race and  
13 gender?

14 A. Yes, sir, because of my gender.

15 Q. Because of your gender?

16 A. Gender.

17 Q. So because you're a female, Mr. Lamar  
18 was excused from assisting with your  
19 room?

20 A. Yes, sir.

21 Q. Now, did he assist with other females  
22 in their rooms when he was floating?

23 A. When he was floating.

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1 Q. So he's the only male. Everybody else  
2 is female?

3 A. Yes, sir.

4 Q. So he would go see other females, float  
5 around and see them and help them, but  
6 it's your claim he wouldn't come and  
7 see you because you're female?

8 A. No. He would go in and do what he had  
9 to do, yes, sir.

10 Q. That's not what I asked you. My  
11 question is -- I think you just stated  
12 to me you thought that Mr. Lamar didn't  
13 come assist you because you're female.

14 A. Yes, sir.

15 Q. My question to you is, did he not  
16 assist other females as a floater?

17 A. What you mean, help?

18 Q. Yeah.

19 A. Assist them, help them?

20 Q. Yeah, help them.

21 A. Yes, sir.

22 Q. So he did help other females --

23 A. Yes, sir.



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1 Q. -- in the ECDC program; correct?

2 A. Correct.

3 Q. When he was floating; right?

4 A. Yes.

5 Q. Because everybody's female; right?

6 A. Yes.

7 Q. Except for him?

8 A. Right.

9 Q. Because he's the only male?

10 A. Yes.

11 Q. It says here, Mr. Lamar was given a  
12 lighter workload. What do mean by  
13 that? I mean, he's part-time; right?

14 A. Yes, sir.

15 Q. At the time February of '05 --

16 A. Right.

17 Q. -- he was part-time?

18 A. Yes, sir.

19 Q. So what are you talking about, he got a  
20 lighter workload?

21 A. He wasn't required to do lesson plans  
22 or he would come in and just assist  
23 Ms. D taking out the trash and helping

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1 with lunch.

2 Q. I mean, was it his responsibility to do  
3 lesson plans?

4 A. Yes, sir.

5 Q. Was he a teacher?

6 A. Yes, sir.

7 Q. I thought he was a floater.

8 A. He was a teacher.

9 Q. He was a floater, then a teacher?

10 A. Yes, sir.

11 Q. So you're saying when he was a teacher,  
12 he would not be required to do lesson  
13 plans?

14 A. No, sir.

15 Q. What would he do all day?

16 A. Help Ms. Darlene Maye.

17 Q. You mean when he's her assistant or  
18 when he's a teacher?

19 A. When he's a teacher.

20 Q. So -- okay. Let me ask. When did he  
21 become a teacher?

22 A. In '05.

23 Q. He became a teacher in '05?

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1 A. (Witness nods head.)

2 Q. What part in '05?

3 A. Like the middle of the year.

4 Q. The middle of '05.

5 A. '04.

6 Q. Do what?

7 A. The middle of the year.

8 Q. Middle of '05?

9 A. Yes, sir.

10 Q. Correct? He became a teacher?

11 A. Yes, sir.

12 Q. What age?

13 A. Pre-K.

14 Q. Pre-K?

15 A. Yes.

16 Q. Same as you?

17 A. Right.

18 Q. Was he the only teacher in his room?

19 A. No, sir. He was with me.

20 Q. So y'all were working together?

21 A. When he came in there. See, he was  
22 supposed to come in there, but he never  
23 did until I left and went home, or he

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1       came at naptime when the children was  
2       down at nap, to relieve me for my  
3       break.

4       Q. Okay. He was part-time; right?

5       A. Right.

6       Q. So what's the problem? What's the  
7       discrimination? What's the problem?

8       A. He was to come in there at twelve to  
9       help me in the classroom. At  
10      twelve o'clock, he was to come in and  
11      assist me in the classroom.

12      Q. Okay.

13      A. But he also was supposed to make lesson  
14      plans, because at the end of the day  
15      when I'm gone, he's supposed to  
16      implement his lesson plan.

17      Q. Okay. What does that have to do  
18      with --

19      A. He never did.

20      Q. -- these folks discriminating against  
21      you? How did they discriminate against  
22      you by him not doing a lesson plan?

23                      MR. HURST: Well, I think she's

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1 already answered the question. She's  
2 saying if he didn't ask -- if he didn't  
3 do the lesson plan, they discriminated.  
4 It's badgering now. She's already said  
5 it.

6 MR. GARRETT: But she hasn't  
7 sued him. He's not a defendant.

8 MR. HURST: Well, they're  
9 obviously in control of him.

10 Q. You're saying that as a part-time  
11 teacher, he was supposed to come in and  
12 help you in 2005 as a co-teacher. He  
13 was supposed to come in at noon and  
14 relieve you from -- when you were  
15 watching the kids nap.

16 A. Right.

17 Q. And then after you left at 3:30, he was  
18 supposed to do lesson plan; right?

19 A. He's supposed to implement the lesson  
20 plan.

21 Q. He was supposed to implement the lesson  
22 plan --

23 A. Right.

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1 Q. -- after 3:30?

2 A. Yes.

3 Q. Were those his only duties?

4 A. Not when he first got there. He was  
5 helping Ms. Darlene Maye.

6 Q. I'm talking about in your classroom in  
7 the middle of '05 when he was a  
8 co-teacher with you.

9 A. Those were his duties.

10 Q. And you're saying he didn't do those  
11 duties?

12 A. He didn't do those duties.

13 Q. And the part -- and when you're saying  
14 he didn't do those duties, the part he  
15 failed in was the lesson plan,  
16 implementing the lesson plan?

17 A. And helping with the children.

18 Q. After you left at 3:30?

19 A. During -- twelve, going into nap room  
20 and help laying the cots and getting  
21 the children prepared for naptime.

22 Q. So you're saying he didn't help you  
23 enough?